

FILED

JULY 20 2009  
MAGISTRATE JUDGE P. MICHAEL MAHONEY  
United States District Court

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

UNITED STATES OF AMERICA )  
vs. ) No. 08 CR 50051  
RAUL RAYGOZA, ) Magistrate Judge P. Michael Mahoney  
CESAR N. SANCHEZ, ) (Judge Philip G. Reinhard)  
CRISTOBAL PEREZ, )  
JUAN ESPINOZA, and )  
ABIGAIL BERRONES )

**PROTECTIVE ORDER**

Upon the agreed motion of the United States for a protective order, it is hereby ordered as follows:

1. All materials produced by the government in preparation for or in conjunction with any stage of the proceedings in this case, including but not limited to grand jury transcripts, agency reports, witness statements, memoranda of interview, and any documents provided by the government, excluding trial exhibits, remain the property of the United States. Within 30 days following the later of sentencing, conclusion of an appeal, or an earlier resolution of charge(s) against the defendant, all such materials and all copies made thereof shall be returned to the United States without further order of Court. All material returned shall be segregated and preserved by the United States for a period of two years after sentencing or an earlier resolution of the charge(s) against the defendant.

2. All materials provided by the United States may be utilized by defendant and his counsel solely in connection with the defense of this case and for no other purpose and in connection with no other proceeding. The materials and their contents shall not be disclosed either directly or indirectly to any person or entity other than defendant, defendant's counsel, persons employed to assist in the defense, or such other persons as to whom the Court may authorize disclosure. Any

notes or records of any kind that defense counsel or any other recipient may make relating to the contents of materials provided by the government shall not be disclosed to anyone other than the defendant, defense counsel, and persons employed to assist in the defense, or such other person as to whom the Court may authorize disclosure, and all such notes and records shall not be disclosed except as provided by this Order.

3. The materials shall not be copied or reproduced by defense counsel or any other recipient, except as necessary to provide copies of the materials for use by defense counsel, defendant and such persons as are employed by them to assist in the defense. Such copies and reproductions shall be treated in the same manner as the original matter.

4. Prior to providing or disclosing any of the materials to any recipient, defense counsel shall provide a copy of this Order to each recipient and shall advise each recipient that at the conclusion of this case, the materials must be returned to defense counsel. All individuals and entities receiving these materials from defense counsel shall be subject to this Order and shall not further disclose the materials or their contents except as permitted by this Order or any further order of this Court. Defense counsel shall maintain a copy of this Order that has been signed and dated by each recipient who received any materials subject to this Order.

5. Violation of this Order may result in the imposition of civil and criminal sanctions.

DATE: \_\_\_\_\_

Agreed and Jointly submitted by:

JERRY A. LUND  
Attorney for Defendant Raul Raygoza

\_\_\_\_\_ DATE

MICHAEL J. PHILLIPS  
Attorney for Defendant Cesar Sanchez

\_\_\_\_\_ DATE

HANEETI. OMAR  
Attorney for Defendant Cristobal Perez

\_\_\_\_\_ DATE

DAVID J. BROWN  
Attorney for Defendant Juan Espinoza

\_\_\_\_\_ DATE

JOHN M. NELSON  
Attorney for Defendant Abigail Berrones

11/9/09  
~~10/7/09~~ DATE

Monica V. Mallory  
MONICA V. MALLORY  
Assistant United States Attorney

12/29/08 DATE

5. Violation of this Order may result in the imposition of civil and criminal sanctions.

ENTER:

DATE: \_\_\_\_\_

P. MICHAEL MAHONEY  
UNITED STATES MAGISTRATE JUDGE

Agreed and Jointly submitted by:



JERRY A. LUND  
Attorney for Defendant Raul Raygoza

\_\_\_\_\_ DATE

MICHAEL J. PHILLIPS  
Attorney for Defendant Cesar Sanchez

\_\_\_\_\_ DATE

HANEEF L. OMAR  
Attorney for Defendant Cristobal Perez

\_\_\_\_\_ DATE

DAVID J. BROWN  
Attorney for Defendant Juan Espinoza

\_\_\_\_\_ DATE

JOHN M. NELSON  
Attorney for Defendant Abigail Berrones

\_\_\_\_\_ DATE

Monica V. Mallory  
MONICA V. MALLORY  
Assistant United States Attorney

12/29/08  
DATE

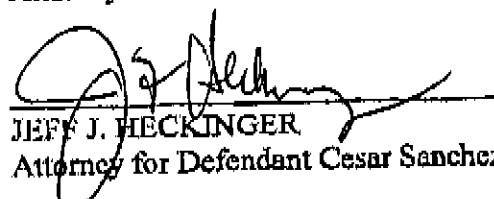
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Agreed and Jointly submitted by:

JERRY A. LUND  
Attorney for Defendant Raul Raygoza

  
JEFF J. HECKINGER  
Attorney for Defendant Cesar Sanchez

DATE

1-12-09  
DATE

HANEEF L. OMAR  
Attorney for Defendant Cristobal Perez

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DAVID J. BROWN  
Attorney for Defendant Juan Espinoza

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JOHN M. NELSON  
Attorney for Defendant Abigail Berrones

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Monica V. Mallory  
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Assistant United States Attorney

1-13-09  
DATE